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bcc

Subject Fw: Nease: Mirex soil sampling (A28)

Hi Rainer,

As you know. Ohio EPA has been conducting field oversight this week on the ongoing pre-design work. Based on difficult site conditions, the composite mirex soil sample A28 was not collected in the targeted location. My understanding is that a new composite sample will be collected to better meet the objectives of the work plan. However, a secondary objective could be to understand the limits of the soil cap in the area shown as A01. Please see Sheila's email below for more details. As such, I am requesting that you retain sub-sample A28-01 for potential future analysis. The remaining original composite and sub-samples do not need to be retained.

Thanks. Mary

---- Forwarded by Mary Logan/R5/USEPA/US on 06/04/2009 09:57 AM ----



"Sheila Abraham"
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06/02/2009 02:19 PM

To Mary Logan/R5/USEPA/US@EPA

CC

Subject Nease: Mirex soil sampling (A28)

** High Priority **

Mary, feedback re the mirex soil sampling in A28:

Sample A28 on the east is bounded by a ditch/swale. We collected 6 sub-samples in A28: 2 in the ditch (A28-01; A28-05), 1 slightly to upgradient of the citch but possibly influenced by ditch materials (A28-03), and 3 in the higher topographical area between the ditch and the fence (A28-02; A28-04; A28-06). The samples were composited as directed by the workplan, but separate aliquots were also retained. The samples have not yet been shipped off (A30 & A31 are yet to be collected).

As discussed, the ditch subsamples may not be representative of the higher topographical area or of the area on the other side of the fence. I am open to re-collecting samples in this area (because of the compositing constraint we cannot recollect individual samples—we have to re-collect A28 and re-composite). Mike Mussellman from Golder is available to re-collect A28 later this week.

I do have one concern about the area and the ditch/swale. The northern end

based on Howells & Baird ends in a rock pile in the Pond 7 area. We could not determine where the south end terminates (area is VERY brambly and also overgrown with poison ivy). Given the topography, the ditch may have higher mirex concentrations than the surrounding area. For the northern part of the ditch this is not a concern, as based on the figures the northern part will be under the low permeability cap. However, the southern part of the ditch (in A01) will not be under a cap (based on what we know at this point); the closest mirex sample (one of the 5 subsamples in A01) is 1900 ug/kg. I don't know if this sample was collected in the ditch and is thus representative of ditch concentrations (as I was not there when the sample was collected).

Recommendation: If we re-collect A28, can we retain the current A28-01 for future analysis? If A28 comes back higher than the risk goal, we know the area (including the ditch) will have to be addressed. However if A28 comes back lower than the risk goal, I would like to be sure that there are no high mirex concentrations in the ditch.

Can you follow up on this with ROC/ Golder?

P.S. I know USEPA allowed a 250 day or 280 day holding period for the samples, but I don't know if the lab had imposed other time constraints (i.e., will we get the results for A28 back in a timely fashion to make a decision regarding the ditch?)